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#### Comments on Solid Waste Rule Revisions

#### Article 1

- 1. Support the definitions of definition of Composting, and Daily Through-put.
- 2. It appears that the definition of garbage was removed, previously described as: Garbage means all animal and vegetable wastes resulting form the processing, handling, preparation, cooking and serving of food or food materials. Was this removed?

## Article 6

1. R18-13-603, Unattended Facilities: Support the language there should be provisions for protection, cleanup and on-going maintenance of unattended sites.

## Article 7

- 1. R18-13-700 #4- Believe this type of process should have plan review, does this include human waste?
- 2. R18-13-700 #4- The wording "and not processing only vegetative waste" is not clear. Suggest this be changed to "only processing vegetative waste". This would apply throughout Article 7 where "not processing only vegetative wastes" is utilized.
- 3. R18-13-701 D
  - a. Recommend requiring applicant include actual numbers-volumes of material received daily, process capacities available at the site (how much waste can be handled per the facility).
  - b. Recommend including language that a proposed site must have applicable zoning and use approval prior to Department approval.
  - c. Support language in R18-13-701 F, G, H, requiring documentation sealed by a professional engineer registered in Arizona.
  - d. What compliance process is utilized for a self certifying site when they are non compliant? It would be helpful to have a reference to that the applicant must operate in accordance with the Article or per statute.
- 4. R-13-703#E, Support language addressing run off and run on to a site.
- 5. R18-13-710 A. Despite awkward language, support direction for addressing in in-vessel and only vegetative waste in a different manner.
- 6. R18-13-710A 1. This can be omitted as "not in vessel" is in the title of this section.

- 7. R18-1101 A.2.- Commercial and industrial septage are not biosolids as per R18-9-1001. Do they meet the definition as a solid waste and required to meet this section?
- 8. 18-13-1102A.1. 2. 3. & 4. Recommend language adding ... new waste facility or an expansion of an existing solid waste facility subject to 49-762...
- 9. R18-13-1104A. & B. Recommend language adding or a lateral expansion of an existing MSW landfill.
- 10. R18-13-1125 E. We support this section including the revisions to E.

# Article 11

1. CCHD supports the revisions to Article 11.

## Article 13 – No comments

These comments are submitted on behalf of Coconino County Health Department by:

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